

**Federal Defenders  
OF NEW YORK, INC.**

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December 21, 2021

**BY ECF**

Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Anthony Rose*, 19 Cr. 789 (PGG)**

Dear Judge Gardephe:

I write to respectfully request that the Court modify Anthony Rose's travel restrictions to allow his attendance at several business-related trainings and conferences. On October 8, 2021, I wrote to the Court seeking permission for Mr. Rose to travel on 14 occasions between November 11, 2021 and June 20, 2022. ECF No. 536. The Court granted his request for the first three dates and denied, without prejudice, the remaining travel requests, in light of the January 24, 2022 travel date in this case. ECF No. 556.

Since that time, Mr. Rose has entered a guilty plea in this case. He will not be proceeding to trial. Following his guilty plea, his bail conditions remained unchanged. I therefore renew my request for Mr. Rose to travel to the following EHC events:

- 1/27/21 – 1/31/22: Colorado
- 2/11/22 – 2/14/22: Orlando, FL
- 2/26/22 – 2/28/22: Columbia, SC
- 3/11/22 – 3/14/22: Pittsburgh, PA
- 3/26/22 – 3/28/22: Fayetteville, NC
- 4/9/22 – 4/11/22: Miami, FL
- 4/23/22 – 4/25/22: Charleston, SC
- 5/7/22 – 5/9/22: Washington, DC
- 5/21/22 – 5/23/22: Charlotte, NC
- 6/4/22 – 6/6/22: Virginia Beach, VA
- 6/18/22 – 6/20/22: Myrtle Beach, SC

As noted in my October 8, 2021 letter, Pretrial Services and the Government take no position on this request. Thank you for considering it.

Respectfully submitted,

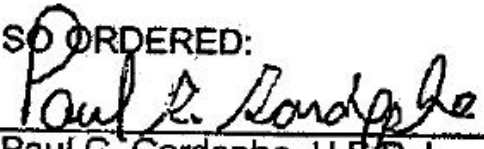
/s/ Ariel Werner  
Ariel Werner, Esq.  
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(212) 417-8770

cc: Mathew Andrews, Assistant U.S. Attorney  
Louis Pellegrino, Assistant U.S. Attorney  
Courtney DeFeo, U.S. Pretrial Officer

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

  
Paul G. Gardephe, U.S.D.J.

**Dated:** December 23, 2021